

**FILED**  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.

★ SEP 23 2010 ★

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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**LUCILLE M. SMITH, CESAR QUINONES,  
ALBERT TORRES and JOHN RUSSO on  
behalf of themselves and classes of those  
similarly situated,**

**BROOKLYN OFFICE**

**Civil Action No. 07-CV-1791**

**Plaintiffs,**

**against**

**ELECTRONICALLY FILED**

**CITIGROUP INC.,**

**Defendant.**

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**STIPULATED ORDER APPROVING SETTLEMENT**

After a confidential review of the Confidential Global Settlement Agreement presented by the parties as well as the form for the Confidential Agreement and General Releases of Plaintiffs Lucille Smith, Cesar Quinones, Albert Torres, John Russo, Jeffrey Jerome and Donald Griewank ("Named Plaintiffs"), the Court determines that the terms of the settlement of this litigation are fair and reasonable, including the amounts contemplated to be paid to Named Plaintiffs and individuals who opt into this case ("Opt-Ins") as well as the fees paid to Plaintiffs' attorneys. Accordingly, the Court approves the settlement, including the forms of releases to be signed by Named Plaintiffs and Opt-Ins in order to participate in the settlement. For any Opt-In, negotiating the settlement check shall constitute an enforceable release of all claims for wages and overtime payments due to such individual.

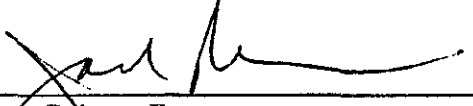
The Confidential Global Settlement Agreement and the exhibits thereto, with the exception of Exhibits 1, 2, 4 and 6, shall be filed with the Court and maintained under seal in order to maintain the confidentiality of those documents. The transcripts of the January 12, 2010 and July 15, 2010 conferences before the Court shall also be maintained under seal. Upon the

signing of this Order by the Court, the parties shall file under seal with the Court fully executed copies of the Confidential Global Settlement Agreement and the exhibits thereto.


SO ORDERED this 22 day of September, 2010.

s/ John Gleeson  
Honorable John Gleeson

Agreed to on behalf of themselves and their firms, and each of the Opt-Ins Individually and Collectively:

  
\_\_\_\_\_  
Jack A. Raisner, Esq.  
Outten & Golden LLP  
3 Park Avenue  
29th Floor  
New York, New York 10016  
(212) 245-1000

Agreed to on behalf of Defendant:

  
\_\_\_\_\_  
Sam S. Shaulson, Esq.  
Morgan, Lewis & Bockius LLP  
101 Park Avenue  
New York, New York 10178  
(212) 309-6000

Attorneys for Citigroup Inc.

\_\_\_\_\_  
Karl J. Stoecker, Esq.  
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22 Jericho Turnpike, Suite 100  
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(212) 818-0080

Attorneys for Lucille Smith, Cesar Quinones,  
Albert Torres, John Russo, Jeffrey Jerome and  
Donald Griewank and those Opt-Ins who have  
not selected other counsel

signing of this Order by the Court, the parties shall file under seal with the Court fully executed copies of the Confidential Global Settlement Agreement and the exhibits thereto.

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2010.

\_\_\_\_\_  
Honorable John Gleeson

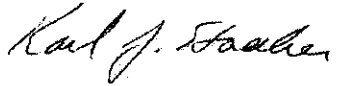
Agreed to on behalf of themselves and their firms, and each of the Opt-Ins Individually and Collectively:

Agreed to on behalf of Defendant:

\_\_\_\_\_  
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